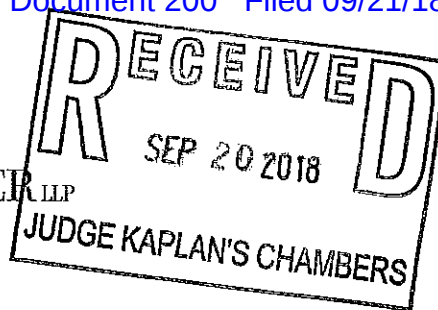


WILLKIE FARR & GALLAGHER LLP



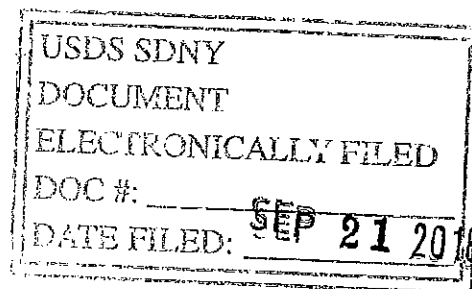
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September 20, 2018

BY EMAIL

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Gatto, et al., 17-cr-686 (LAK)

Dear Judge Kaplan,

We are writing on behalf of all defendants in *United States v. Gatto* to request the Court's permission to allow the following equipment for use at the trial in this matter.

Equipment	Quantity	Description
Tech Table	1	Small table to be placed behind the defense table.
Widescreen monitor	1	Display device being used by defense teams
Laptop	4	1 Laptop to present evidence for Defendants (to be used jointly), 1 Laptop for attorney Mark Moore; 1 Laptop for attorney Steven Haney; 1 Laptop for attorney Casey Donnelly.
VGA/HDMI/Switch	n/a	Cabling to complete setup
Cell Phones	3	One each for attorneys Mark Moore, Merl F. Code, and Steven Haney, who do not have SDNY Passes, as they are admitted pro hac vice. These will not be brought into the courtroom.

Defendants further request permission to have this equipment installed on Friday, September 28, at 11am. The installation should only take 30 minutes.

Defendants also request the Court's permission to allow defense counsel (1) to use a remote "Real Time" transcript feed that will stream the trial transcript to attorneys and trial support staff working with the defense teams outside of the courtroom and (2) to

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arrange for the provision of secure, high-speed wired internet access in the courtroom for use at the trial of this matter.

The remote Real Time transcript feed will promote efficiency at trial by enabling defense team personnel to follow Court proceedings remotely from their law firm offices or trial war rooms while working in real time on issues essential to the efficient and effective representation of defendants during trial. Real time transcript feeds will not be shared with anyone other than the defendants' respective attorneys and trial support teams, and the defendants will be responsible for all official court reporter fees and any other costs related to the provision of the remote Real Time services.

A secure, wired internet connection similarly will facilitate the effective and efficient presentation of evidence and representation of the defendants in this matter. Internet access will enable the trial teams in the courtroom to stay connected to voluminous online document repositories, as well as other resources and work product during critical moments of the proceedings. In addition, having access to electronic materials outside of the courtroom will reduce both the number of defense files and personnel in the courtroom, as well as the traffic to and from the courtroom during proceedings.

Subject to Your Honor's approval, we will retain Courtroom Connect to provide these services. Courtroom Connect has a contract with the Southern District of New York to be the exclusive provider of internet access for attorneys. It does not require any Court resources to provide service and currently maintains a network in the courthouse that is 100% independent of the Court's internal network. Set up, installation, and all service fees will be paid for by the parties at no cost to the Court.

Many trials in federal courts throughout the country have used a high-speed connection to the internet in the courtroom. The following describes how Courtroom Connect restricts access to the network and ensures compliance with court security and directives:

- The network will be a hard-wired, secure physical network connection utilizing a firewall and other security provisions.
- Onsite support, maintenance, monitoring, off-site user authentication, and many other measures are provided to ensure the highest levels of security and reliability.
- The network is totally separate from the court's internal network; it is therefore physically impossible for information on the court's existing systems to be accessed or compromised.

Courtroom Connect will make all necessary arrangements with the Court's District Executive office and computer networking personnel. Jeff Gibbs (877-838-9080 x112)

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from Courtroom Connect is available to answer any questions about service and can provide any additional information that the Court may need.

Thank you for your consideration.


Respectfully submitted,



Michael S. Schachter

cc: All Counsel of Record (via email)

SO ORDERED


LEWIS A. KAPLAN, USDJ

9/20/18